



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 16, 2015

VIA ECF AND FACSIMILE TRANSMISSION

FAX # 212-805-0426

The Honorable Laura Taylor Swain
United States District Judge
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Chambers 1320
New York, New York 10007

Re: United States v. Manuel Antonio Lluberes Rodriguez
13 Cr. 165 (LTS)

Dear Judge Swain:

The Government writes to request, with the consent of Joshua Dratel, Esq., counsel for the defendant, that the time from today through January 4, 2016, the date of the first pretrial conference in this matter be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). By way of background, on December 10, 2015, Lluberes Rodriguez was taken into custody by the DEA in Panama pursuant to an extradition request by the United States. Lluberes Rodriguez had previously been arrested in Panama on or about April 24, 2014 pursuant to a provisional arrest warrant issued on the basis of the above-referenced indictment. On December 11, 2015, Lluberes Rodriguez was presented and arraigned before Magistrate Judge Ronald L. Ellis. Lluberes Rodriguez was detained on consent of defense counsel. Upon consultation with your Honor's law clerk, an initial pretrial conference was set for January 4, 2016 at 3:00 p.m.

The Government is preparing and intends to produce discovery early next week. I have spoken with Joshua Dratel, Esq., counsel for the defendant, who consents to the exclusion of time under the Speedy Trial Act from today through January 4, 2016. The Government therefore

[REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

Respectfully requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from today through January 4, 2016, to allow defense counsel time to consult with his client and begin reviewing discovery.

Very truly yours,

PREET BHARARA
United States Attorney

by: _____/s/_____
Elisha J. Kobre
Assistant United States Attorney
(212) 637-2599

cc: Joshua Dratel, Esq.